

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
HARRISONBURG DIVISION**

UNITED STATES OF AMERICA

v.

IVAN RUIZ-GONZALEZ

Defendant.

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Case No. 5:23-cr-00006

UNOPPOSED MOTION TO AMEND TERMS OF PRETRIAL RELEASE

Now comes the Defendant, Ivan Ruiz-Gonzalez, by and through his attorney and respectfully requests that this Honorable Court grant this motion to amend the terms of his pretrial release, pursuant to this Court's inherent discretion. In support thereof, the following may be said:

1. Mr. Ruiz-Gonzalez lives and works in Hagerstown, Maryland. His pretrial release prohibits leaving the WDVA or Marland without permission.
2. His job involves delivering appliances and his employer regularly works outside of Maryland. (Attachment 'A').
3. He is requesting to be able to travel into Virginia, West Virginia, and Pennsylvania for work purposes only. His pretrial supervisor in Maryland requested a modification of his pretrial release conditions.
4. Counsel for Mr. Ruiz-Hernandez has consulted with the Government about this request and Ron Huber, AUSA, does not object. United States Probation Officer Angela George also has no objections to this request.
5. This motion is made in good faith.

6. WHEREFORE, counsel for the defendant respectfully requests that the Court grant this Motion to allow Mr. Ivan Ruiz-Gonzalez to travel outside of Maryland to Virginia, West Virginia, and Pennsylvania for work purposes.

Respectfully submitted this 2nd day of October 2023.

Ivan Ruiz-Gonzalez
By Counsel

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CERTIFICATE OF SERVICE

I hereby certify that on October 2, 2023, I caused an electronic copy of Mr. Ivan Ruiz-Gonzalez's Motion to Amend to be served on all parties to this action via CM/ECF.

/s/ Andrew Carter Graves

Andrew Carter Graves